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**Fwd: MTNL comments on TRAI Consultation Paper- 06/2015**

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**Sanjeev Banzal, Advisor TRAI** <advmn@trai.gov.in>

Mon, Dec 21, 2015 at 5:40 PM

To: sbanzal@gmail.com, vinod.kotwal@nic.in, fa@trai.gov.in, ramesh.al.trai@gmail.com, soniatrai@gmail.com

----- Forwarded message -----

From: Sde Ra &lt;raco.mtnl@gmail.com&gt;

To: "advmn@trai.gov.in" &lt;advmn@trai.gov.in&gt;, Jaipal Singh Tomar &lt;trai.jams@gmail.com&gt;

Cc:

Date: Mon, 21 Dec 2015 17:31:24 +0530

Subject: MTNL comments on TRAI Consultation Paper- 06/2015

Respected Sir,

Kindly find attached herewith with MTNL comments on TRAI Consultation Paper on "Valuation and Reserve Price of Spectrum in 700, 800, 900, 1800, 2100, 2300 and 2500 MHz Bands" for kind consideration please.

R.K. Gupta

DE(RA),CO

**NOTE: SIGNED COPY OF LETTER HAS BEEN DISPATCHED TO TRAI.****MTNL comments on auction of spectrum CP.doc**

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To,

The Advisor (NSL)  
TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper on “Valuation and Reserve Price of Spectrum in 700, 800, 900, 1800, 2100, 2300 and 2500 MHz Bands”.

TRAI issued Consultation paper on 26.11.2015 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. MTNL comments in this regards are as given:

**Q1 to Q17: No comments.**

**Q18. (a) Whether the guidelines for liberalisation of administratively allotted spectrum in 900 MHz band should be similar to what has been spelt out by the DoT for 800 and 1800 MHz band? In case of any disagreement, detailed justifications may be provided.**

**MTNL Comment:** Many TSPs hold spectrum in all three bands namely 800/900 & 1800 MHz. Hence, to maintain uniformity, it should be similar to guidelines for 800 & 1800 MHz bands.

**b) Should the liberalization of spectrum in 800, 900 and 1800 MHz be made mandatory?**

**MTNL Comment:** The spectrums were allotted prior to 2012 to TSPs, according to the prevalent policy of the government, accommodating the relevant conditions, at the relevant time. As such the current policy of government in respect of liberalization of spectrum should not be made effective retrospectively. Further, the earlier policy of spectrum allotment on payment of One Time Spectrum Charges (OTSC) is under challenge by some operators in the court of law, and the matter being subjudice, it is advised that the decision in this regard may please be taken after the outcome of the decisions in the court cases.

**Q19 to Q30: No comments.**

(R.K. Gupta)  
DE(RA),CO